

in controversy from \$14,360.00 to \$214,441.65 plus an unidentified amount for the cost to replace a damaged cooler. The defendant's Notice of Removal has been filed within 30 days of the date of the filing of plaintiff's Motion to Amend. (A copy of the plaintiff's Motion For Leave to File Amended Complaint and the proposed Amended Complaint are attached as **Exhibit B.**)

4. Pursuant to the amended complaint filed by the plaintiff, the plaintiff is a citizen and resident of the State of Tennessee.

5. Defendant, Nationwide Mutual Insurance Company, is an Ohio Company whose principal place of business is in Columbus, Ohio.

6. Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. Furthermore, because the amount in controversy exceeds the jurisdictional requisite and fewer than thirty days have expired since the filing of the Motion to Amend, therefore this Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b).

WHEREFORE, the Defendant hereby gives notice of the removal of this action from the Circuit Court for Bradley County, Tennessee to the United States District Court for the Eastern District of Tennessee, Southern Division, and requests that the proceedings be held thereon.

Respectfully submitted,

TRAMMELL, ADKINS & WARD, P.C.

By s/Andrew J. Lewis
Brian H. Trammell, BPR #010140
Andrew J. Lewis, BPR #028090
Attorneys for the Defendant
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Knoxville, Tennessee 37950
865/330-2577

CERTIFICATE OF SERVICE

The undersigned hereby certifies that an exact copy of this pleading has been served on all counsel of record by placing same in the United States Mail, postage prepaid, by delivering same to the office of said counsel, or via facsimile.

C. Scott Johnson, Esq.
Patrick B. Hawley, Esq.
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P.O. Box 869
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J. Allen Murphy, Jr., Esq.
3555 Keith Street, NW, Suite 213
Cleveland, TN 37312

This 13th day of November, 2014.

TRAMMELL, ADKINS & WARD, P.C.

By s/ Andrew J. Lewis
Brian H. Trammell
Andrew J. Lewis

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

ART G. ELLIS,
Plaintiff. ,

v.

Case No. _____

NATIONWIDE MUTUAL
INSURANCE COMPANY,
Defendant.

DISCLOSURE STATEMENT


I, the undersigned, counsel of record for Nationwide Mutual Insurance Company,

certify to the best of my knowledge and belief:

☒ My client has no corporate interests to be identified under *Federal Rule of Civil Procedure 7.1* or *Federal Rule of Criminal Procedure 12.4*.

☐ My client has the following parent corporation(s):

☐ The following publicly held corporation(s) own 10% or more of my client's stock:



(Signature of Counsel)
11/13/14

(Date)